

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

**IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY LITIGATION**

MDL NO. 2327

THIS DOCUMENT RELATES TO ALL CASES

UNOPPOSED MOTION TO APPOINT SETTLEMENT MASTER

M. Brandon Smith, Esq. and Childers Schlueter & Smith (“Plaintiffs’ Counsel”), as counsel for certain plaintiffs in *In Re: Ethicon, Inc. Pelvic Repair System Products Liability Litigation*, MDL 2327 (S.D. W.Va.), and Defendants Ethicon, Inc. have entered into a Confidential Master Settlement Agreement (the “MSA”) to resolve the claims related to the implantation of Ethicon, Inc.’s Pelvic Repair Products, as defined in the MSA. Plaintiffs’ Counsel, with no opposition of Defendant Ethicon, Inc., and pursuant to the terms of the Confidential Master Settlement Agreement (the “MSA”), hereby moves this Court to appoint Randi S. Ellis as the Settlement Master in aid of execution of the settlement.

Randi S. Ellis is a member of the Louisiana State Bar and remains in good standing with the same. Currently, she has a full-time neutral practice and has been appointed by several Federal Courts in Multi-District Litigation, Class Action and Mass Torts. She has previously served as a mediator and Settlement Master for Transvaginal Mesh cases involving claims against Boston Scientific, CR Bard, Covidien, Ethicon and Mentor. *See* Affidavit of Randi S. Ellis attached as Exhibit A.

CONCLUSION

For the foregoing reasons, Plaintiffs' Counsel respectfully requests that the Court appoint Randi S. Ellis as the Settlement Master to aid in the execution of the settlement pursuant to the Master Settlement Agreement and enter an order in the form submitted herewith.

Dated: July 20, 2018

Respectfully Submitted,

/s/: M. Brandon Smith

M. Brandon Smith

WV State Bar # 11751

CHILDERS, SCHLUETER &
SMITH, LLC

1932 N. Druid Hills Road, Suite 100

Atlanta, GA 30319

Phone: (404) 419-9500

Fax: (404) 419-9501

Email: bsmith@cssfirm.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on this 20th July, 2018 a copy of the foregoing document was electronically filed. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's System.

/s/: M. Brandon Smith
M. Brandon Smith